1 Vanessa R. Waldref United States Attorney 2 Eastern District of Washington 3 Frieda K. Zimmerman Special Assistant United States Attorney 4 Tyler H.L. Tornabene 5 Assistant United States Attorney Post Office Box 1494 6 Spokane, WA 99210-1494 7 Telephone: (509) 353-2767 8 UNITED STATES DISTRICT COURT 9 FOR THE EASTERN DISTRICT OF WASHINGTON 10 11 UNITED STATES OF AMERICA. 2:22-CR-53-TOR 12 Plaintiff, **INDICTMENT** 13 Vio: 18 U.S.C. § 1343 14 V. Wire Fraud 15 NATASHA ANN OPSAL. (Counts 1, 2, 3, 4, 5, 6) 16 Defendant. 18 U.S.C. § 287 17 False, Fictitious, or Fraudulent 18 Claims (Counts 7, 8, 9) 19 20 18 U.S.C. § 981, 28 U.S.C. § 21 2461 Forfeiture Allegations 22 23 The Grand Jury charges: 24 GENERAL ALLEGATIONS 25 26 At all times relevant to this Indictment, the Defendant, NATASHA 1. 27 ANN OPSAL was a resident of Spokane, Washington. 28

INDICTMENT – 1

- 2. The Coronavirus Aid, Relief, and Economic Security Act ("CARES" Act) was a federal law enacted on March 27, 2020, designed to provide emergency financial assistance to the millions of Americans who were suffering the economic effects caused by the COVID-19 pandemic. One source of relief provided by the CARES Act was the authorization of forgivable loans to small businesses for job retention and other certain expenses, through a program referred to as the Paycheck Protection Program ("PPP").
- 3. In order to obtain a PPP loan, a qualifying business was required to submit a PPP loan application signed by an authorized representative of the business. The PPP loan application required the business (through its authorized representative) to acknowledge the program rules and make certain affirmative certifications in order to be eligible to obtain the PPP loan. In the PPP loan application, the applicant (through its authorized representative) was required to state, among other things: (a) its average monthly payroll expenses; and (b) its number of employees. If the applicant had no employees other than the owner, the applicant was required to provide the gross income amount from a 2019 or 2020 IRS Form 1040, Schedule C. These figures were used to calculate the amount of money the small business was eligible to receive under the PPP. Additionally, the application was required to certify that they were in operation as of February 15, 2020. The applicant was also required to certify that the information in the application was true and correct to the best of the applicant's knowledge.
- 4. A business's PPP loan application was received and processed, in the first instance, by a participating lender. If a PPP loan application was approved, the participating lender funded the PPP loan using its own monies. Data from the application, including information about the borrower, the total amount of the loan, the listed number of employees, and the gross income amount, was transmitted by

the lender to the Small Business Administration ("SBA"), an agency of the United States, in the course of processing the loan.

- 5. PPP applications are received in cloud-based platforms. The location of the server through which the PPP application is submitted is based on the date the application was processed by the SBA and the application number. During the time period relevant to this Indictment, all PPP applications were received through the Summit platform, a cloud-based platform utilizing the AWS GOV cloud servers located in Oregon. PPP lenders submitted disbursement details into the SBA E-Tran system in Sterling, Virginia. E-Tran transmitted the PPP processing fee to the lender through the FMS system to the Treasury. The primary server for FMS is in Sterling, Virginia.
- 6. In addition to the PPP loan program, the CARES act also authorized the Economic Injury Disaster Loan ("EIDL") program. EIDL is a SBA program that provides low-interest funding to small businesses, renters, and homeowners affected by declared disasters.
- 7. In order to obtain an EIDL and advance, a qualifying business must submit an application to the SBA and provide information about its operations, such as the number of employees, gross revenues for the 12-month period preceding the disaster, and cost of goods sold in the 12-month period preceding the disaster. In the case of EIDLs for COVID-19 relief, the 12-month period was the year preceding January 31, 2020. The applicant must also certify that all the information in the application is true and correct to the best of the applicant's knowledge.
- 8. The amount of an EIDL, if the application is approved, is determined based, in part, on the information provided in the application about employment, revenue, and cost of goods, as set forth above. Any funds issued under an EIDL or advance are issued directly by the SBA. EIDL funds can be used for payroll

expenses, sick leave, production costs, and business obligations, such as debts, rent, and mortgage payments. If the applicant also obtains a loan under the Paycheck Protection Program, the EIDL funds cannot be used for the same purpose as the Paycheck Protection Program funds.

9. EIDL applications are received in cloud-based platforms. The location of the server through which the EIDL application is submitted is based on the date the application was processed by SBA and the application number. During the time period relevant to this Indictment, all EIDL applications were received in a Microsoft cloud-based platform using a Rapid Finance application, through SBA servers located in Des Moines, Iowa.

The Scheme

- 10. The allegations in paragraphs 1 through 9 of this Indictment are incorporated as though realleged herein.
- 11. Beginning no later than on or about April 4, 2020, and continuing through at least July 25, 2021, in the Eastern District of Washington and elsewhere, Defendant NATASHA ANN OPSAL devised and intended to devise a scheme to defraud the SBA, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.
- 12. Specifically, Defendant NATASHA ANN OPSAL, applied for and received three PPP loans using false information about her purported company, Rusty Bumper Mobile Detailing, with the intent to defraud, steal, and convert the proceeds of the PPP Loans for Defendant NATASHA ANN OPSAL's personal use and without any intent to use the proceeds thereof for any authorized purpose, or any intent to repay the PPP Loans.
- 13. Additionally, Defendant NATASHA ANN OPSAL, applied for eight EIDLs using false information about her purported company, Rusty Bumper Mobile Detailing, with the intent to defraud, steal, and convert the proceeds of the EIDLs

for Defendant NATASHA ANN OPSAL's personal use and without any intent to use the proceeds thereof for any authorized purpose, or any intent to repay the EIDLs.

Manner and Means

It was part of this scheme that:

- 14. On or about April 4, 2020, Defendant NATASHA ANN OPSAL applied for an EIDL by submitting application number 3302212935 to the SBA under the name of her purported business, Rusty Bumper Mobile Detailing. Defendant NATASHA ANN OPSAL listed Rusty Bumper Mobile Detailing's business address as the personal address on her Idaho State Driver's License.
- 15. Defendant NATASHA ANN OPSAL falsely stated in application number 3302212935 that Rusty Bumper Mobile Detailing had been established on July 15, 2018, that it had 1 employee as of January 1, 2020, and that its 2019 gross revenue was \$10,000. Defendant NATASHA ANN OPSAL indicated that the Federal Tax ID was XX-XXX-1201, which is Defendant NATASHA ANN OPSAL's social security number.
- 16. On or about June 7, 2020, Defendant NATASHA ANN OPSAL applied for an EIDL by submitting application number 3304335795 to the SBA under the name of her purported business, Rusty Bumper Mobile Detailing. Defendant NATASHA ANN OPSAL listed the "business address" of the purported business as her residential address in Spokane, Washington, but with her apartment number omitted.
- 17. Defendant NATASHA ANN OPSAL falsely stated in application number 3304335795 that Rusty Bumper Mobile Detailing had been established on September 15, 2015, that it had 1 employee as of January 1, 2020, and that its 2019 gross revenue was \$40,000. Defendant NATASHA ANN OPSAL indicated that

the Federal Tax ID was XX-XXX-1201, which is Defendant NATASHA ANN OPSAL's social security number.

- 18. On November 6, 2020, Defendant NATASHA ANN OPSAL applied for and was assigned Employee Identification Number (EIN) 85-3786210 for Rusty Bumper Mobile Detailing. EINs are assigned by the IRS on a business by business basis, and are uniquely formulated numbers that do not mirror the requestor's social security number.
- 19. On or about November 18, 2020, Defendant NATASHA ANN OPSAL applied for an EIDL by submitting application number 3315328537 to the SBA as Natasha Opsal DBA Rusty Bumper Mobile Detailing. Defendant NATASHA ANN OPSAL listed the "business address" of the purported business as 7911 N. Shenandoah Ct., Spokane, Washington.
- 20. Defendant NATASHA ANN OPSAL falsely stated in application number 3315328537 that Rusty Bumper Mobile Detailing had been established on January 11, 2019, that it had 2 employees as of January 1, 2020, and that its 2019 gross revenue was \$25,000. Defendant NATASHA ANN OPSAL indicated that the Federal Tax ID was 85-3786210.
- 21. On or about December 14, 2020, Defendant NATASHA ANN OPSAL applied for an EIDL by submitting application number 3315589394 to the SBA as Natasha Opsal DBA Rusty Bumper Mobile Detailing. Defendant NATASHA ANN OPSAL listed the "business address" of the purported business as 7911 N. Shenandoah, Spokane, Washington.
- 22. Defendant NATASHA ANN OPSAL falsely stated in application number 3315589394 that Rusty Bumper Mobile Detailing had been established on June 2, 2015, that it had 1 employee as of January 1, 2020, and that its 2019 gross revenue was \$45,000. Defendant NATASHA ANN OPSAL indicated that the

Federal Tax ID was XX-XXX-1201, which is Defendant NATASHA ANN OPSAL's social security number.

- 23. On or about January 1, 2021, Defendant NATASHA ANN OPSAL applied for an EIDL by submitting application number 3315945863 to the SBA as Natasha Opsal DBA Rusty Bumper Mobile Detailing. Defendant NATASHA ANN OPSAL listed the "business address" of the purported business as 7914 N. Shenandoah Ave., Spokane, Washington.
- 24. Defendant NATASHA ANN OPSAL falsely stated in application number 3315945863 that Rusty Bumper Mobile Detailing had been established on June 15, 2019, that it had 1 employee as of January 1, 2020, and that its 2019 gross revenue was \$35,000. Defendant NATASHA ANN OPSAL indicated that the Federal Tax ID was XX-XXX-1201, which is Defendant NATASHA ANN OPSAL's social security number.
- 25. On or about January 1, 2021, Defendant NATASHA ANN OPSAL applied for an EIDL by submitting application number 3315946665 to the SBA as Natasha Opsal DBA Rusty Bumper Mobile Detailing. Defendant NATASHA ANN OPSAL listed the "business address" of the purported business as 7914 N. Shenandoah, Spokane, Washington.
- 26. Defendant NATASHA ANN OPSAL falsely stated in application number 3315946665 that Rusty Bumper Mobile Detailing had been established on June 15, 2019, that it had 1 employee as of January 1, 2020, and that its 2019 gross revenue was \$3,500. Defendant NATASHA ANN OPSAL indicated that the Federal Tax ID was XX-XXX-1201, which is Defendant NATASHA ANN OPSAL's social security number.
- 27. On or about March 11, 2021, Defendant NATASHA ANN OPSAL submitted PPP Loan application number 26776140 to SBA listing "Natasha Opsal" as the Business Legal Name and listing "Rusty Bumber detailing" [sic] as the DBA

or Tradename. In the application, Defendant NATASHA ANN OPSAL listed the "business address" of the purported business as her residential address in Spokane, Washington.

- 28. On application number 26776140, Defendant NATASHA ANN OPSAL falsely stated that the business was established in 2019, had 1 employee, and had gross income of \$82,000 in tax year 2020. Defendant NATASHA ANN OPSAL also certified that the business was in operation on February 15, 2020. Defendant NATASHA ANN OPSAL indicated that Tax Identification Number for Natasha Opsal DBA Rusty Bumper was XX-XXX-1201, which is Defendant NATASHA ANN OPSAL's social security number. This application was submitted through the Summit platform, a cloud-based platform utilizing the AWS GOV cloud servers located in Oregon.
- 29. On application number 26776140, Defendant NATASHA ANN OPSAL certified that the information in the application was true and accurate, subject to criminal penalties for knowingly making false statements.
- 30. The representations and certifications made by Defendant NATASHA ANN OPSAL on application number 26776140 were materially false, and Defendant NATASHA ANN OPSAL knew they were false at the time they were made. In fact, Rusty Bumper Detailing was not created in 2019, and was not a legitimate existing business at the time of Defendant NATASHA ANN OPSAL's PPP application. Moreover, Rusty Bumper Detailing did not have any employees, did not exist as of February 15, 2020, and did not have any income in tax year 2020. Accordingly, Rusty Bumper Detailing and Defendant NATASHA ANN OPSAL were not eligible for any PPP funding.
- 31. Using the above materially false information on application number 26776140, Defendant NATASHA ANN OPSAL applied for a PPP loan of \$17,082.00 through lender Capital Plus Financial, LLC. As a result of the fraud

and relying on the materially false and fraudulent representations and certifications made by Defendant NATASHA ANN OPSAL, on or about March 13, 2021, the lender funded Defendant NATASHA ANN OPSAL's PPP loan for \$17,082.00. The SBA assigned PPP loan number 19556486-01.

- 32. PPP loan number 19556486-01 was handled by Capital Plus Financial, LLC, a community development financial institution based out of Bedford, Texas, on a delegated basis from the SBA. Capital Plus Financial, LLC, submitted disbursement details for this loan into the SBA E-Tran system located in Sterling, Virginia.
- 33. On March 24, 2021, as a result of the fraudulent scheme described above, and the materially false and fraudulent information supplied by Defendant NATASHA ANN OPSAL in application number 26776140, Capital Plus Financial, LLC, disbursed \$17,082.00 to Defendant NATASHA ANN OPSAL's Spokane, Washington, Chime Account ending in 6756 for PPP loan number 19556486-01.
- 34. On or about April 2, 2021, Defendant NATASHA ANN OPSAL applied for an EIDL by submitting application number 3318122105 to the SBA as Natasha Opsal DBA Rusty Bumpet [sic]. Defendant NATASHA ANN OPSAL listed the "business address" of the purported business as her residential address in Spokane, Washington.
- 35. Defendant NATASHA ANN OPSAL falsely stated in application number 3318122105 that her purported business had been established on January 5, 2019, and that its 2019 gross revenue was \$83,000. Defendant NATASHA ANN OPSAL indicated that the Federal Tax ID was XX-XXX-1201, which is Defendant NATASHA ANN OPSAL's social security number.
- 36. On or about April 12, 2021, Defendant NATASHA ANN OPSAL submitted PPP Loan application number 29293039 to SBA listing "rusty bumper

mobile detailing" as the Business Legal Name. In the application, Defendant NATASHA ANN OPSAL listed the "business address" of the purported business as 7911 N. Shenandoah Ct., Spokane, Washington.

- 37. On application number 29293039, Defendant NATASHA ANN OPSAL falsely stated that the business was established in 2020, had one employee, and had gross income of \$93,000 in tax year 2020. Defendant NATASHA ANN OPSAL also certified that the business was in operation on February 15, 2020. Defendant NATASHA ANN OPSAL indicated that the Tax Identification Number for Rusty Bumper Mobile Detailing was 85-3786210. This application was submitted through the Summit platform, a cloud-based platform located in Oregon.
- 38. On application number 29293039, Defendant NATASHA ANN OPSAL certified that the information in the application was true and accurate, subject to criminal penalties for knowingly making false statements.
- 39. The representations and certifications made by Defendant NATASHA ANN OPSAL on application number 29293039 were materially false, and Defendant NATASHA ANN OPSAL knew they were false at the time they were made. In fact, Rusty Bumper Mobile Detailing was not created in 2020, and was not a legitimate existing business at the time of Defendant NATASHA ANN OPSAL's PPP application. Moreover, Rusty Bumper Mobile Detailing did not have any employees, and did not exist as of February 15, 2020, nor did it have any income in tax year 2020. Accordingly, Rusty Bumper Mobile Detailing was not eligible for any PPP funding.
- 40. Using the above materially false information on application number 29293039, Defendant NATASHA ANN OPSAL applied for a PPP loan of \$19,375.00. As a result of the fraud and relying on the materially false and fraudulent representations and certifications made by Defendant NATASHA ANN OPSAL, on or about April 22, 2021, the lender funded Defendant NATASHA

ANN OPSAL's PPP loan for \$19,375.00. The SBA assigned PPP loan number 8562388-03.

- 41. PPP loan number 8562388-03 was handled by Prestamos CDFI, LLC, a community development financial institution based out of Phoenix, Arizona, on a delegated basis from the SBA. Prestamos CDFI, LLC, submitted disbursement details for this loan into the SBA E-Tran system located in Sterling, Virginia.
- 42. On May 10, 2021, as a result of the fraudulent scheme described above, and the materially false and fraudulent information supplied by Defendant NATASHA ANN OPSAL in application number 29293039, Prestamos CDFI, LLC, disbursed \$19,375.00 to Defendant NATASHA ANN OPSAL's Spokane, Washington bank account with Coastal Aspiration ending in 4033 for PPP loan number 8562388-03.
- 43. On or about April 29, 2021, Defendant NATASHA ANN OPSAL submitted PPP Loan application number 30425393 to SBA listing "Natasha Opsal" as the Business Legal Name. In the application, Defendant NATASHA ANN OPSAL listed the "business address" of the purported business as the address of her residential building in Spokane, Washington, but did not include her apartment number.
- 44. On application number 30425393, Defendant NATASHA ANN OPSAL falsely stated that the business was established in 2020, had one employee, and had an average monthly payroll cost of \$6,916.00. Defendant NATASHA ANN OPSAL also certified that the business was in operation on February 15, 2020. Defendant NATASHA ANN OPSAL indicated that the Tax Identification Number was XX-XXX-1201, which is Defendant NATASHA ANN OPSAL's social security number. This application was submitted through the Summit platform, a cloud-based platform utilizing the AWS GOV cloud servers located in Oregon. On application number 30425393, Defendant NATASHA ANN OPSAL

certified that the information in the application was true and accurate, subject to criminal penalties for knowingly making false statements.

- 45. The representations and certifications made on application number 30425393 by Defendant NATASHA ANN OPSAL were materially false, and Defendant NATASHA ANN OPSAL knew they were false at the time they were made. In fact, the business "Natasha Opsal" was not created in 2020 and was not a legitimate existing business at the time of Defendant NATASHA ANN OPSAL's PPP application. Moreover, the business "Natasha Opsal" did not have any employees, and did not exist as of February 15, 2020, nor did it have any income in tax year 2020. Accordingly, the business "Natasha Opsal" was not eligible for any PPP funding.
- 46. Using the above materially false information in application number 30425393, Defendant NATASHA ANN OPSAL applied for a PPP loan of \$17,290.00. As a result of the fraud and relying on the materially false and fraudulent representations and certifications made by Defendant NATASHA ANN OPSAL, on or about May 12, 2021, the lender funded Defendant NATASHA ANN OPSAL's PPP loan for \$17,290.00. The SBA assigned PPP loan number 96194189-04.
- 47. PPP loan number 96194189-04 was handled by Prestamos CDFI, LLC, a community development financial institution based out of Phoenix, Arizona, on a delegated basis from the SBA. Prestamos CDFI, LLC, submitted disbursement details for this loan into the SBA E-Tran system located in Sterling, Virginia.
- 48. On May 23, 2021, as a result of the fraudulent scheme described above, and the materially false and fraudulent information supplied by Defendant NATASHA ANN OPSAL in application number 30425393, Prestamos CDFI, LLC, disbursed \$17,290.00 to Defendant NATASHA ANN OPSAL's Spokane,

Washington, bank account with Choice Financial Group ending in 2899 for PPP loan number 96194189-04. At the time of disbursement of this PPP Loan, the Choice Financial Group Account held less than a dollar.

- 49. On or about July 25, 2021, Defendant NATASHA ANN OPSAL applied for an EIDL by submitting application number 3322759926 to the SBA under the name of her purported business, Rusty Bumper Mobile Detailing.

 Defendant NATASHA ANN OPSAL listed the "business address" of the purported business as 7911 N. Shenandoah, Spokane, Washington.
- 50. Defendant NATASHA ANN OPSAL falsely stated in application number 3322759926 that her purported business had been established on May 6, 2018, and that its 2019 gross revenue was \$90,000. Defendant NATASHA ANN OPSAL indicated that the Federal Tax ID was 85-3786210
- 51. A table comparing some of the information provided by Defendant NATASHA ANN OPSAL on various applications is provided below:

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Application	T	Application	Tax ID/EIN	Emplo	Date Established	Income/	Requested Amount	Applicant	Street Address
Number	Туре	Date	Tax ID/EIN	yees	established	Revenue	Ambuni	Natasha Opsal DBA	2707 E. 37th Ave
06776140	DDD	2/11/2021	XX-XXX1201	Ι,	2010	82,000	17 000	Rusty Bumber detailing	
26776140	PPP	3/11/2021	AA-AAA1201	1	2019	02,000	17,062	Rusty Bumper Mobile	7911 N. Shenandoah
00000000	DDD	4/10/2021	05 2706210	١,	2020	02 000	10.275	Detailing	Ct
29293039	PPP	4/12/2021	85-3786210	- - 1	2020	93,000	19,575	Natasha Opsal DBA	
20425202	nnn	4000001	VV VVV1201	١,	2020	N/A	17 200	Natasha Opsal	2707 E. 37th Ave
30425393	PPP	4/29/2021	XX-XXX1201	1	2020	NIA	17,290	Rusty bumper mobile	ZIVI IS STULMIC
								detailing DBA Rusty	
2202212025	THIN	4440000	XX-XXX1201	١,	7/15/2018	10 000	20,000		4660 N. Atlantic dr
3302212935	RIDL	4/4/2020	AA-AAA1201_	1	1/13/2016	10,000	20,000	-	4000 IV. Addide di
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3304335795	EIDL	6/7/2020	XX-XXX1201	1	9/15/2015	40,000	80,000	bumper mobile detailing	2707 E. 37th
ļ				ł		1		Natasha Opsal DBA	
						· '		Rusty bumper mobile	7911 N. Shenandoah
3315328537	EIDL	11/18/2020	85-3786210	2	1/11/2019	25,000	50,000	detailing	ct
								Natasha Opsal DBA	
		1						Rusty bumper mobile	
3 315589394	EIDL	12/14/2020	XX-XXX1201	1	6/2/2015	45,000	90,000	detailing	7911 N. Shenandoah
			ļ					Natasha Opsal DBA	
						į.		Rusty bumper mobile	7914 N. Shenandoah
3315945863	EIDL	1/1/2021	XX-XXX1201	1	6/15/2019	35,000	109,800	detailing	Ave
1				ł			ŀ	Natasha Opsal DBA	
							i	Rusty bumper mobile	
3315946665	EIDL	1/1/2021	XX-XXX1201	1	6/15/2019	3,500	1,800	detailing	7914 N. Shenandoah
			1					Natasha Opsal DBA	2707 E. 37th Ave
3318122105	EIDL	4/2/2021	XX-XXX1201	0	1/5/2019	83,000	41,500	rusty bumpet	Apt 215
								Rusty bumper mobile	
			i					detailing DBA Rusty	
3322759926	EIDL	7/25/2021	85-3786210	0	5/6/2018	90,000	160,800	bumper mobile detailing	7911 N. Shenandoah

Counts 1-6

52. On or about each of the dates set forth below, in the Eastern District of Washington and elsewhere, the Defendant NATASHA ANN OPSAL, for the purpose of executing the scheme described above, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below for each count, each transmission constitution a separate count:

Count	Date	Description
1	March 11,	PPP Loan Application No. 26776140, electronically
	2021	submitted from the Eastern District of Washington to the
		SBA in Oregon.

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2	March 24,	EFT payment from Capital Plus Financial, LLC, in
	2021	Bedford, Texas to Chime Account ending in 6756 in
		Spokane, Washington, in the amount of \$17,082.00 for
		PPP Loan No. 19556486-01.
3	April 12,	PPP Loan Application No. 29293039, electronically
	2021	submitted from the Eastern District of Washington to the
		SBA in Oregon.
4	May 10, 2021	EFT payment from Prestamos CDFI, LLC, in Phoenix,
		Arizona, to Coastal Aspiration Account ending in 4033
		in Spokane Washington, in the amount of \$19,375.00 for
		PPP Loan No. 8562388-03.
5	April 29,	PPP Loan Application No. 30425393, electronically
	2021	submitted from the Eastern District of Washington to the
		SBA in Oregon.
6	May 23, 2021	EFT payment from Prestamos CDFI, LLC, in Phoenix,
		Arizona, to Choice Financial Group Account ending in
-		2899 in Spokane Washington, in the amount of
		\$17,290.00 for PPP Loan No. 93194189-04.

All in violation of 18 U.S.C. § 1343.

Counts 7-9

53. On or about each of the dates set forth below, in the Eastern District of Washington and elsewhere, the Defendant NATASHA ANN OPSAL, made and presented to the United States Small Business Administration claims concerning PPP applications, knowing said claims were false and fraudulent, and knowing the information submitted was materially false and fraudulent, described below for each count, each transmission constitution a separate count:

Count	Date	Description
7	March 11, 2021	PPP application number 26776140 in the name of Natasha Opsal DBA "Rusty Bumber detailing" for an PPP loan in the amount of \$17,082.00.

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8	April 12, 2021	PPP application number 29293039 in the name of "rusty bumper mobile detailing" for an PPP loan in the amount of \$19,375.00.
9	April 29, 2021	PPP application number 30425393 in the name of Natasha Opsal DBA "Natasha Opsal" for an PPP loan in the amount of \$17,290.00.

All in violation of 18 U.S.C. § 287.

NOTICE OF FORFEITURE ALLEGATIONS

The allegations contained in this Indictment are hereby realleged and incorporated herein by this reference for the purpose of alleging forfeitures.

Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon conviction of an offense in violation of 18 U.S.C. § 1343, as alleged in Counts 1 through 6 of this Indictment, Defendant NATASHA ANN OPSAL shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the offense. The property to be forfeited includes, but is not limited to, the following:

MONEY JUDGMENT

A sum of money equal to \$53,747.00 in United States currency, representing the amount of proceeds obtained by Defendant, NATASHA ANN OPSAL from the wire fraud violations.

If any of the property described above, as the result of any act or omission of the Defendant, NATASHA ANN OPSAL:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property pursuant to 21

U.S.C. § 853(p), as incorporated by 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c). DATED this 3 day of May 2022. A TRUE BILL Vanessa R. Waldref United States Attorney Frieda K. Zimmerman Special Assistant United States Attorney Tyler H.L. Tornabene Assistant United States Attorney

INDICTMENT – 17